

MORRISON & FOERSTER LLP
250 W. 55th St.
New York, New York 10019
Telephone: (212) 468-8000
Facsimile: (212) 468-7900
Norman S. Rosenbaum
Jordan A. Wishnew
Erica J. Richards

Counsel for the ResCap Liquidating Trust

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

_____)	
In re:)	Case No. 12-12020 (MG)
)	
RESIDENTIAL CAPITAL, LLC, <u>et al.</u> ,)	Chapter 11
)	
Debtors.)	Jointly Administered
_____)	

**NOTICE OF PRESENTMENT OF RESCAP LIQUIDATING TRUST’S MOTION FOR
ENTRY OF AN ORDER CLARIFYING SCOPE OF STAY RELIEF UNDER
SUPPLEMENTAL SERVICING ORDER WITH RESPECT TO LALOR ACTION**

PLEASE TAKE NOTICE that the ResCap Liquidating Trust (the “**Liquidating Trust**”), established pursuant to the terms of the Chapter 11 plan confirmed in the above captioned cases, has filed the *ResCap Liquidating Trust’s Motion for Entry of an Order Clarifying Scope of Stay Relief Under Supplemental Servicing Order with Respect to Lalor Action* (the “**Motion**”), seeking entry of an order substantially in the form attached as Exhibit 1 thereto (the “**Order**”).

PLEASE TAKE FURTHER NOTICE that the Liquidating Trust will present the Order to the Honorable Martin Glenn, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York (the “**Bankruptcy Court**”), Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004, Room 501, for signature on **March 20, 2015 at 12:00 a.m. (prevailing Eastern time)**.

PLEASE TAKE FURTHER NOTICE that responses or objections to the Motion, if any, must be made in writing, conform to the Federal Rules of Bankruptcy Procedure, the Local Bankruptcy Rules for the Southern District of New York, and the Notice, Case Management, and Administrative Procedures approved by the Bankruptcy Court [Docket No. 141], be filed electronically by registered users of the Bankruptcy Court's electronic case filing system, and be served by first-class mail, so as to be received no later than **March 19, 2015 at 4:00 p.m. (Prevailing Eastern Time)**, with a hard copy delivered directly to Chambers, upon (a) counsel for the Liquidating Trust, Morrison & Foerster LLP, 250 W. 55th St., New York, NY 10019 (Attention: Norman S. Rosenbaum, Jordan A. Wishnew and Erica J. Richards); (b) co-counsel to the ResCap Liquidating Trust, Kramer Levin Naftalis & Frankel, LLP, 1177 Avenue of the Americas, New York, NY 10036 (Attention: Kenneth H. Eckstein, Douglas H. Mannal, and Joseph A. Shifer); (c) the Office of the United States Trustee for the Southern District of New York, 201 Varick Street, Suite 1006, New York, NY 10014 (Attention: Linda A. Riffkin, and Brian S. Masumoto); (d) The ResCap Liquidating Trust, Quest Turnaround Advisors, 800 Westchester Avenue, Suite S-520, Rye Brook, NY 10573 (Attention: Jeffrey Brodsky); and (e) counsel for (i) GMAC Mortgage, LLC, (ii) Ocwen Loan Servicing, LLC, (iii) 21st Mortgage, and (iv) Christiana Trust, a division of Wilmington Savings Fund Society, FSB as trustee for Knoxville 2012 Trust, Hinshaw & Culbertson LLP, 800 Third Avenue 13th Floor, New York, NY 10022 (Attention: Benjamin Noren).

PLEASE TAKE FURTHER NOTICE that, if no objections to the Order are timely filed, served and received in accordance with this Notice, the Court may enter the Order without further notice or hearing.

PLEASE TAKE FURTHER NOTICE THAT a copy of the Motion may be obtained at
via PACER at <http://www.nysb.uscourts.gov>.

Dated: March 13, 2015
New York, New York

/s/ Norman S. Rosenbaum
Norman S. Rosenbaum
Jordan A. Wishnew
Erica J. Richards
MORRISON & FOERSTER LLP
250 W. 55th St.
New York, New York 10019
Telephone: (212) 468-8000
Facsimile: (212) 468-7900

Counsel for the ResCap Liquidating Trust